

Prevention of insider trading



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Amid repeated lapses and rising instances of unpublished price sensitive information (UPSI) leaks, stronger safeguards have never been more urgent. These incidents have amplified legal, reputational and governance risks for organisations. To protect market integrity and safeguard investor interest, Securities and Exchange Board of India (SEBI) continues to introduce stringent amendments that demand stronger accountability from businesses and to actively detect, prevent and respond to market abuse. As scrutiny intensifies, companies must strengthen their controls, frameworks and surveillance mechanisms to stay compliant and maintain stakeholder trust - creating a clear need for robust, future ready solutions to prevent insider trading.



How SEBI's evolving framework is reshaping the compliance landscape

India's regulatory landscape is undergoing a fundamental shift. SEBI has moved beyond merely penalising insider trading and is actively reshaping the entire ecosystem of information governance, traceability and market integrity.

PAN level trading restrictions tighten

monitoring: SEBI's framework freezes PANs at the security level for designated persons and their immediate relatives during trading window closures, strengthening oversight and preventing inadvertent violations.

Event based UPSI triggers sharper disclosure

discipline: A precise, event driven definition aligned with the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 requires companies to identify and disclose UPSI with far greater accuracy.

The ambit of insiders is widening: SEBI's expanded definition of "connected persons" increases accountability and broadens compliance responsibilities across the organisation.

Digital footprints are now mandatory: Structured digital databases (SDDs) record every movement of UPSI in an immutable, traceable format - closing long standing gaps in information governance.



Evolving regulatory and operational challenges in safeguarding UPSI

Rising regulatory scrutiny has significantly elevated expectations around how organisations manage and safeguard UPSI. Yet the operational reality of modern workplaces continues to make effective controls increasingly complex.

Modern workplaces have amplified this challenge. High velocity data flows, multiple communication channels, hybrid work models, and extended stakeholder networks have blurred traditional control boundaries, increasing the risk of accidental and negligent UPSI disclosure. Sensitive information frequently moves across functions and external parties through informal digital interactions that are difficult to monitor consistently.

As regulatory focus shifts toward process gaps and lapses, organisations must manage UPSI as an ongoing enterprise risk - requiring coordinated controls, strong documentation and organisation-wide discipline rather than only isolated compliance measures. Key challenges include:



Evolving regulatory requirements:

Stricter definitions of insiders and tighter trading-window controls continue to increase the burden of policy updates, training, and cross-functional alignment.



Expanded exposure through digital collaboration:

Hybrid work models, informal messaging, personal devices, and cloud-based tools make it harder to control sensitive information flows, increasing the likelihood of unintentional UPSI disclosure.



Fragmented UPSI information flows:

UPSI originates across multiple functions and external stakeholders and without central governance and strong documentation, organisations face heightened risk of leakage or unauthorised access.



Inadequate documentation and audit trails:

Incomplete or inconsistent records of UPSI access, timing and purpose, weaken audit readiness and create vulnerabilities during regulatory reviews and investigations.



Limited oversight of relatives' trading:

Trading by immediate relatives without timely pre-clearance increases the risk of non-compliant transactions during restricted periods.



Our key offerings

I. Building awareness: Comprehensive training solutions in compliance with SEBI (Prohibition of Insider Trading) Regulations, 2015

Building a strong compliance culture starts with awareness. Organisations must ensure that employees, designated persons, and senior leaders understand the PIT regulations, UPSI handling requirements, and escalation responsibilities.

Our blended learning approach delivers practical, scenario-based insights that drive real behavioural change and comprises of:

- 1 Instructor-led training sessions (virtual/in-person)
- 2 Engaging, self-paced e-learning module

What our trainings covers

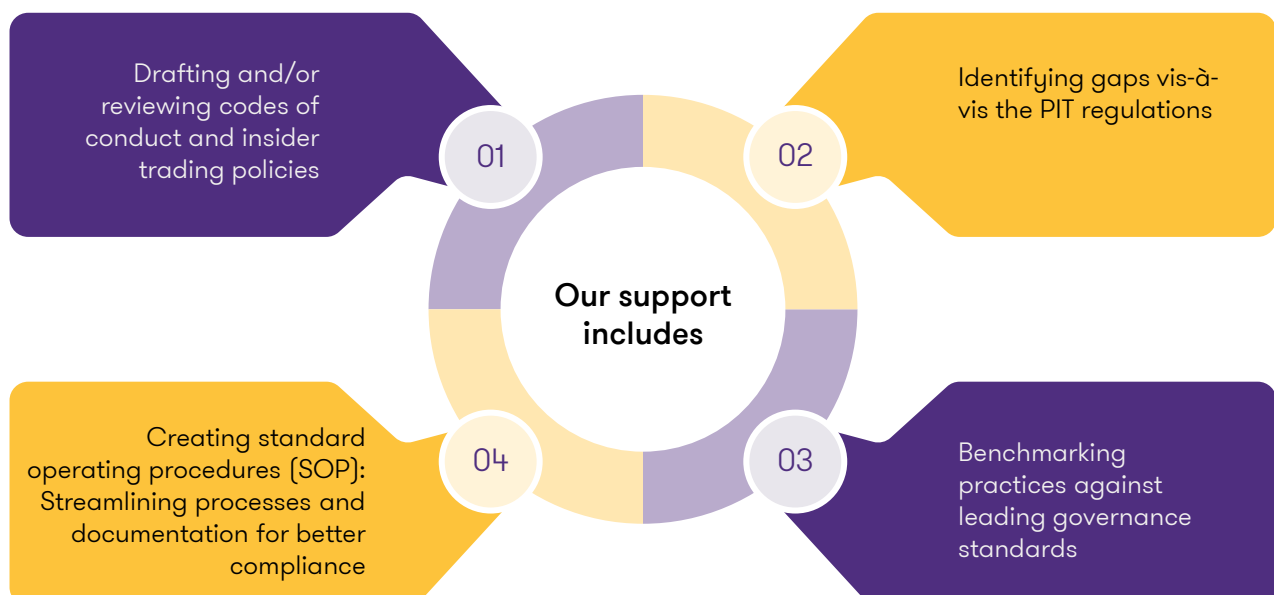
- 01 Key legal concepts under the PIT regulations
- 02 How UPSI is created, handled and potentially leaked
- 03 Roles, responsibilities and escalation protocols
- 04 Real-world dilemmas through interactive scenarios

Course highlights

- 01 Practical, easy-to-understand compliance guidance
- 02 Case studies inspired by real workplace challenges
- 03 Knowledge checks via self-assessment modules
- 04 A concise, high-impact learning experience
- 05 Sessions led by experts with practical, real-world industry experience

II. Policy and procedure design: Strengthening insider trading governance

Preventing insider trading requires clear policies and streamlined processes. We work with organisations to build and enhance robust governance frameworks aligned with regulatory requirements and leading industry standards.



III. PIT compliance review: Process evaluation and risk mitigation

Our PIT compliance review assesses the adequacy of existing controls, key UPSI touchpoints and provides recommendations to strengthen the overall compliance framework.

Our methodology includes



The Grant Thornton Bharat advantage



Comprehensive insider trading compliance support

We deliver end to end insider trading compliance solutions, spanning employee training, the development of robust governance frameworks and enterprise wide assessment of UPSI related risks. Our integrated approach ensures risks are identified and managed without anything falling through the cracks.



Engaging, experience-led compliance trainings

Our instructor led programmes and immersive e learning modules simplify PIT regulations requirements through relatable case studies, interactive scenarios, and knowledge checks, translating regulations into real-world actions your teams can understand and apply.



Strong regulatory alignment

We align your codes, policies, and procedures with PIT regulations, the latest amendments, and leading governance practices - helping your organisation remain compliant, defensible and audit ready at all times.



Multi-disciplinary expertise with practical insights

Our team brings deep, cross functional expertise in forensics, compliance, governance, technology, and leading industry practices. This breadth of experience allows us to deliver practical, future ready solutions tailored to your organisational needs.



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